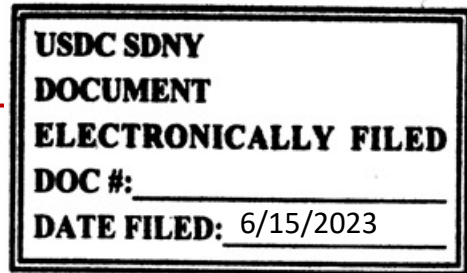


OSBORN LAW P.C.

Daniel A. Osborn, Esq.
Lindsay M. Trust, Esq.



June 8, 2023

VIA ECF

Honorable Mary Kay Vyskocil
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

APPLICATION GRANTED

Hon. Katharine H. Parker, U.S.M.J. 6/15/2023

Re: *Alvarez Baltazar v. Commissioner of Social Security*
Civil Action No. 1:23-cv-02272-MKV

Dear Judge Vyskocil,

We write on behalf of plaintiff, Yesenia Alvarez Baltazar, and with the consent of the defendant, to request additional time to file plaintiff's motion for judgment on the pleadings which is currently due on June 14, 2023 per the Court's March 17, 2023 Standing Order. This is plaintiff's first request for an extension.

Counsel feels the time is necessary due to the number of Social Security briefs we have due in the next three weeks.

After conferring with the defendant, the parties have agreed to proceed according to the following amended scheduling order, subject to the Court's approval:

- a. Plaintiff to file her motion for judgment on the pleadings on or before **August 23, 2023**;
- b. Defendant to file its response/cross-motion on or before **November 1, 2023**;
and
- c. Plaintiff to file her reply (if any) on or before **November 22, 2023**.

Honorable Mary Kay Vyskocil
June 8, 2023
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Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn
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cc: Victoria Treanor, Esq. (by ECF)